

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

Case No.: 2011-021207-FC-04
Division: FAMILY

MARIO ALBERTO JIMENEZ,

Petitioner/Father,

and

KAREN WIZEL,

Respondent/Mother.

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**SECOND MOTION FOR TEMPORARY ATTORNEY'S FEES,
SUIT MONEY AND COSTS**

Respondent, KAREN WIZEL, by and through the undersigned attorney, files this Second Motion For Temporary Attorney's Fees, Suit Money and Costs and states as follows.

1. Respondent has employed the firm of Reyes Miller, P.L. to represent her in this action and has agreed to pay the firm a reasonable fee.
2. Respondent is without sufficient funds with which to pay counsel and for costs necessary to maintain this action and Petitioner is well able to assist in paying the Respondent's fees and costs incurred in this action.
3. Respondent is a teacher's assistant with a gross monthly income of \$1,360.00 as a Teacher's Assistant. Respondent is a mother of three young children, one of which is still an infant, and has no financial resources from which to draw from.
4. Petitioner is a Medical Doctor with a substantially greater income than the Respondent. The Petitioner now owns his own practice and has a greater ability to pay the necessary fees and costs related to this action.
5. An award of temporary fees and costs is needed to allow Respondent's

attorney to adequately prepare for trial and to defend against the continued spurious litigation caused by the Petitioner.

6. Florida statute and case law supports an award of fees and costs on both a temporary and final basis to a financially needy party when incomes of the parties are disparate.

WHEREFORE, Respondent respectfully requests that this Honorable Court award her temporary attorney's fees, suit money and costs in amounts sufficient to permit her to retain and maintain competent counsel, to perform necessary and adequate discovery and to afford the parties commensurate ability to litigate this cause.

CERTIFICATE OF SERVICE

I certify that a copy of this document was delivered by U.S. Mail to Mario A. Jimenez, 12901 S.W. 66 Terrace Drive, Miami, FL 33183, and on this 18th day of September, 2014.

Respectfully Submitted,

REYES MILLER, P.L.

By: /S/
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